

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

DELIA J. BAEZ,

Defendant.

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CIVIL NO. 10401-RCL

ASSENTED-TO MOTION FOR SECOND EXTENSION

The United States requests that this Court grant an additional extension of time within which to file its dispositive motion in the case. The court previously granted an extension until January 6, 2006. However, regrettably, the undersigned is still working to obtain information needed to present to the Court in support of the government's motion for summary judgment, namely, re-calculation of the amounts of the fraud for the purpose of ensuring that all of the amounts are accurate. She anticipates obtaining that information and filing the government's motion on or before January 16, 2005, and, accordingly requests that the deadline be extended until January 16.

Counsel for Defendant assents to this Motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/ Anita Johnson
ANITA JOHNSON

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Certification of Rule 7.1 Conference

I hereby certify that on this 29th day of December 2005, I conferred with counsel for Defendant, William Keefe, and he assented to this motion.

/s/ Anita Johnson
